

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc.,¹

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

In re:

Technovative Media, Inc.,

Debtor.

Chapter 11

Bky. No. 23-10764 (MDC)

(Jointly Administered)

**[PROPOSED]
ORDER FOR WITHDRAWAL OF WRIT OF SUMMONS
AND EVIDENTIARY HEARING FOR MONETARY DAMAGES**

Upon the motion (the “Motion”)² of the debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”) for entry of an order (this “Order”), and pursuant to sections 105(a) and 542 of the Bankruptcy Code and Bankruptcy Rule 1015(b) requesting that SeeCubic Inc., SLS Holdings VI LLC, Shadron L. Stastney, Hawk Investment Holdings Limited, and Arthur Leonard Robert Morton (the “Hawk Parties”) withdraw their Writ of Summons from the Amsterdam Court in the Netherlands and the commencement of an evidentiary hearing to assess damages against the Hawk Parties; and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and

¹ The Debtors, along with the last four digits of the Debtors’ federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors’ service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

² Capitalized terms used but not defined herein shall have those meanings ascribed to them in the Motion.

the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion and hearing to consider the relief requested herein (the “Hearing”) appearing adequate and appropriate under the circumstances; and this Court having found that no other or further notice need be provided; and the legal and factual bases set forth in the Motion establishing just and sufficient cause to grant the relief requested therein; and the relief granted herein being in the best interests of the Debtors, their estates, creditors and all parties in interest; and the Court having held a conference with the appearances of interested parties noted in the record of the conference; and upon all of the proceedings before the Court and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. SeeCubic Inc., SLS Holdings VI LLC, Shadron L. Stastney, Hawk Investment Holdings Limited, and Arthur Leonard Robert Morton (the “Hawk Parties”) shall immediately withdraw the Writ of Summons filed in the Amsterdam Court of the Netherlands (the “Writ”) against Mathu Rajan and certain of Debtors’ subsidiaries seeking, among other things, to remove Mr. Rajan and appoint Mr. Stastney as director of Debtors’ Dutch subsidiaries. Withdrawal of the Writ, without prejudice, shall be made no later than April 18, 2023 at 5pm CET (Netherlands time).
3. The Hawk Parties and all those acting in concert with them are enjoined from representing that Mr. Stastney is or should be a director of Debtor’s subsidiaries until further order of this Court to allow the Debtors to resume operations to satisfy purchase orders and solicit for new business.

4. The Court shall commence an evidentiary hearing on _____ to determine the assessment of direct, consequential, and punitive monetary damages against the Hawk Parties, such damages to be assessed and setoff against any outstanding debt owed to the Hawk Parties by Debtors plus forfeiture of the Hawk Parties' holdings in Debtors.

5. This Court shall retain jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.

Dated: _____

MAGDELINE D. COLEMAN
United States Bankruptcy Judge